

Exhibit 1

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON, AT SEATTLE

RICHARD LEHMAN, on behalf of himself and
others similarly situated,

Plaintiffs,

v.

WARNER NELSON; WILLIAM BECK, JR.;
BRIAN BISH; KLAAS A. DeBOER;
MICHAEL G. MARSH; ROCKY SHARP;
RICHARD BAMBERGER; DENNIS
CALLIES; CLIF DAVIS; TIM DONOVAN;
HARRY THOMPSON; GARY YOUNGHANS,
in their capacity as Trustees of the IBEW
Pacific Coast Pension Plan,

Defendants.

Case No.: 2:13-CV-1835-RSM

**DECLARATION OF NATHAN R. RING
IN SUPPORT OF DEFENDANTS'
MOTION FOR APPROVAL OF
SUPERSEDEAS BOND AND ORDER OF
STAY OF EXECUTION**

I, Nathan Ring, declare and state as follows:

1. I am an attorney duly licensed to practice in the State of Washington and I am admitted to practice before this Court.
2. I am an associate attorney with The Urban Law Firm, counsel of record for the Defendants, and I have personal knowledge of the information contained within this declaration.
3. Attached hereto as **Exhibit 2** is a true and correct copy of an email exchange dated September 3, 2015, between myself and Joseph P. Hoag, Esq., counsel for Plaintiffs. The email exchange is in reference to the bond amount covering the entire judgment in this case.

Declaration of Nathan R. Ring
Case No. 2:13-CV-1835-RSM

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Counsel for Defendants

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct, and if called as a witness, I could and would competently testify thereto.

3 Executed at Las Vegas, Nevada, on this 17th day of September, 2015.

4 /s/ Nathan R. Ring
5 Nathan R. Ring, Esq., WSBA #46271